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Introduction

On April 15, 1998, the U.S. Environmental Protection Agency (EPA) promulgated final effluent limitations guidelines and standards under 40 CFR 430 of the Clean Water Act (CWA) for the following two subcategories of the pulp, paper, and paperboard industry:

Subpart B	Bleached Papergrade Kraft and Soda
Subpart E	Papergrade Sulfite.

Mills with operations in these subparts are required to comply with the regulation by April 15, 1999, or at the time their permit is reissued, whichever is later. Permit writers and control authorities are required to issue permits and pretreatment agreements to ensure that affected mills are complying with the new regulations. **This document is specifically written to provide guidance to permitting and pretreatment control authorities in issuing NPDES permits and pretreatment agreements to pulp and paper mills which fall within the purview of these two subparts.** Therefore, the “you” throughout this document is addressed to permit writers and control authorities, as appropriate.

You, as a permitting or pretreatment control authority, will need to determine which mills fall under 40 CFR Part 430 and how to write the permits/pretreatment agreements for these mills to ensure their compliance under the new regulations. To help you in this process, EPA has addressed the following topics:

- **Section 2** presents a brief overview of the National Pollutant Discharge Elimination System (NPDES) Program and the National Pretreatment Program;
- **Section 3** presents an overview of the promulgated subcategorization of the Pulp, Paper, and Paperboard Category (40 CFR 430);
- **Section 4** discusses the pollutants regulated under 40 CFR 430 for mills with operations in Subparts B and E;
- **Section 5** discusses the technology bases for the effluent limitations guidelines and standards promulgated for mills with operations in Subparts B and E;
- **Section 6** discusses the in-process and end-of-pipe points where affected mills must demonstrate compliance with the rule;

- **Section 7** presents the effluent limitations guidelines and standards promulgated for mills with operations in Subparts B and E;
- **Section 8** walks through the process of establishing permit limits for mills with operations in Subparts B and E;
- **Section 9** discusses the requirements for establishing Best Management Practices (BMPs) permit requirements;
- **Section 10** discusses the permit requirements for mills enrolling in the Voluntary Advanced Technologies Incentives Program (VATIP);
- **Section 11** presents nine case studies as examples of establishing permits for mills with operations in Subparts B and E; and
- **Section 12** contains a list of resources for additional guidance in establishing permits for affected mills.

This guidance manual also has a number of appendices that contain additional information that may be useful to you in your permitting responsibilities. Please refer to the table of contents at the beginning of this document for more information on appendix contents.

EPA is hopeful that this manual provides guidance on issuing permits and pretreatment agreements to mills with operations in these two subparts in an easy-to-read format. While this manual attempts to address as many permitting issues and situations that may be covered by the regulation, there are other sources that you may wish to consult in issuing permits/pretreatment agreements for mills with operations in Subparts B and E. Therefore, the manual identifies and references other sources throughout the text that you can access to get additional guidance. We have also included in Section 12 a list of these and other sources and how to order them, as well as a list of EPA and other authorities to contact for more guidance.